

REMARKS

This responds to the Office Action mailed on January 19, 2006. Claims 1-12 are currently pending. Claims 1-12 have been rejected. In response, Applicants have amended claim 2, cancelled claim 4, and submit the following remarks. In view of the following remarks, as well as the foregoing amendments, Applicants submit that this application is in complete condition for allowance in this regard.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 1 and 10-12

Claims 1 and 10-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,464,381 to Anderson, Jr. et al. (hereinafter the "Anderson reference") in view of U.S. Patent No. 4,670,819 to Boerema et al. (hereinafter the "Boerema reference"). The Examiner admits that the Anderson reference fails to disclose that the body is a polymer. However, the Examiner contends that the Boerema reference teaches a polymer body. The Examiner further contends that it would have been obvious "to specify the moldable material of Anderson Jr. et al. to be a polymer because polymers are strong, durable, and easily moldable."

Applicants respectfully disagree with these contentions.

Applicants submit that there is no suggestion or motivation to modify the Anderson reference in the suggested manner. Specifically, the Boerema reference teaches away from molding a lamp into a polymer body. Instead, the Boerema reference discloses mechanically clipping an incandescent lamp to a polymer body. Specifically, the electrical lamp 72 of the Boerema reference is mechanically fastened to

a lamp socket 70 that is fixed to the leg 64 of a clip 60 using conventional screws 68. A person having ordinary skill in the art would understand that the use of screws 68 for mechanically fastening to a polymer body does not constitute integral molding with a polymer body. Moreover, the lamp 72 and the lamp socket 70 are physically connected to the clip 60, not to the housing 42. A person of ordinary skill in the art would be motivated by the Boerema reference to modify the Anderson reference such that the electroluminescent panel is clipped to a polymer body. Accordingly, there is no suggestion or motivation to modify the Anderson reference in the suggested manner. For at least this reason, Applicants submit that the Examiner has failed to establish *prima facie* obviousness. Therefore, Applicants request that the rejection of claim 1 be withdrawn.

Moreover, the Boerema reference fails to disclose that a polymer is an acceptable substitute for fiberglass in a fiberglass automobile interior component with a molded construction. Applicants cannot find any disclosure in the Boerema reference to the effect that a person having ordinary skill in the art would substitute a polymer for fiberglass merely because the polymers are "strong, durable, and easily moldable," as suggested by the Examiner. Consequently, a person having ordinary skill in the art would not be motivated to replace the fiberglass material in the Anderson reference with a polymer. For at least this additional reason, the Examiner has failed to establish *prima facie* obviousness. Therefore, Applicants request that the rejection of claim 1 be withdrawn.

With regard to independent claim 10, the Examiner admits that the Anderson reference fails to disclose that the body is a polymer. However, the Examiner

contends that the Boerema reference teaches a polymer body. The Examiner further contends that it would have been obvious “to specify the moldable material of Anderson Jr. et al. to be a polymer because polymers are strong, durable, and easily moldable.” Applicants respectfully disagree.

Applicants submit that the combination of the Anderson and Boerema references fails to teach all claimed features found in independent claim 10. Specifically, claim 10 recites “closing the mold sections and injecting a molten polymer resin through the gate to fill a portion of the mold cavity unfilled by the electroluminescent lamp.” The Anderson reference fails to teach at least “closing the mold sections and injecting a molten polymer resin through the gate to fill a portion of the mold cavity unfilled by the electroluminescent lamp.” The Examiner cites to column 4, lines 57-65 of the Anderson reference as disclosing these features, which states:

Referring to FIG. 5, the electroluminescent panel 12 can also be attached within a recessed portion 28 of substrate 20. This recess can be formed as a part of the original molding of substrate 20 and has the advantage that it helps locate the proper position of the panel 12 during assembly. Also, in instances where either substrate 20 or foam layer 22 are formed in a molding process, the panel 12 can be molded in place so that it is co-bonded to either the substrate 20, foam layer 22, or both.

(Emphasis Added). This excerpt fails to teach, nor does any other passage in the Anderson reference teach at least “closing the mold sections and injecting a molten polymer resin through the gate to fill a portion of the mold cavity unfilled by the electroluminescent lamp.” A statement that a panel 12 can be molded into place to be co-bonded to the substrate 20 does not teach each and every feature of the claim. There is no disclosure of “injecting” “a molten polymer resin,” a “gate,” or to “fill a portion

of the mold cavity unfilled by the electroluminescent lamp.” Many different types of molding processes exist and this limited disclosure fails to teach each and every feature of the claim. The Boerema reference also fails to teach the features of claim 10 and only discloses that the housing 42 can be molded. There is no indication in the Boerema reference or the Anderson reference that one could insert an electroluminescent panel into a mold and fill the mold with a polymer. For at least this reason, the Examiner has failed to establish *prima facie* obviousness. Therefore, Applicants request that the rejection of claim 10 be withdrawn.

Assuming *arguendo* that all features of independent claim 10 were disclosed by the combination of the Anderson and Boerema references, which they are not, there is no suggestion or motivation to modify the Anderson reference in the suggested manner, as discussed above with respect to independent claim 1. Specifically, a person having ordinary skill in the art would be motivated by the Boerema reference to modify the Anderson reference such that the electroluminescent panel is clipped to a polymer body. Moreover, the Boerema reference fails to disclose that a polymer is an acceptable substitute for fiberglass in the fiberglass automobile interior compartment with a molded construction taught by the Anderson reference. Accordingly, there is no suggestion or motivation to modify the Anderson reference in the proposed manner. For at least this additional reason, the Examiner has failed to establish *prima facie* obviousness. Therefore, Applicants request that the rejection of claim 10 be withdrawn.

Claims 11 and 12 depend from independent claim 10. Applicants submit that these claims are also patentable for at least the same reasons discussed above.

Furthermore, these claims each recite a unique combination of elements not disclosed or suggested by the combined disclosures of the Anderson and Boerema references.

Claims 2-9

Claims 2-9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Boerema reference in view of U.S. Patent No. 5,434,013 to Fernandez (hereinafter the "Fernandez reference"). The Examiner admits that the Anderson reference fails to disclose a light source that is an electroluminescent lamp. However, the Examiner further contends that it would have been obvious to modify the Boerema reference to include an electroluminescent lamp, as disclosed in the Fernandez reference, because "electroluminescent light sources emit visible light at a low voltage while maintaining a low temperature." Applicants respectfully disagree with these contentions.

Independent claim 2, as amended, recites "wherein said bolster and said electroluminescent lamp are integrally molded to define a unitary construction." Neither the Boerema reference nor the Fernandez reference discloses or suggests an integrally molded construction of a lamp and body. The Fernandez reference discloses, at column 2, lines 59-62, "a structure for positioning on a portion of an automobile." This ambiguous description fails to disclose an integrally molded unitary construction, as set forth in Claim 2. In addition, as already discussed, the Boerema fails to teach integrally molding but, in contrast, teaches a clip for use in attaching a light source. Neither reference discloses an integrally molded unitary construction. Because the combination of references fails to teach all of the features in independent claim 2, the Examiner has

failed to establish a *prima facie* case of obviousness. For at least this reason, Applicants request that the rejection of claim 2 be withdrawn.

Moreover, Applicants submit that there is no suggestion or motivation to modify the Boerema and Fernandez references in the suggested manner. Figure 4 in the Boerema reference fails to teach an integrally molded construction, as alleged by the Examiner on page 4 of the January 19, 2006 Office Action. Instead, Figure 4 in the Boerema reference teaches mechanically fastening a lamp socket 70 of an electrical lamp 72 to a leg 64 of a clip 60 using conventional screws 68. The Fernandez reference discloses electroluminescent panels that can be placed in a variety of locations inside an automobile but fails to suggest that electroluminescent panels can be molded to an automobile component. As mentioned above, the Fernandez reference discloses, at column 2, lines 59-62, "a structure for positioning on a portion of an automobile." Neither reference discloses or suggests an integrally molded unitary construction. A person having ordinary skill in the art would not be motivated to modify the Boerema and Fernandez references to have an integrally molded unitary construction because "electroluminescent light sources emit visible light at a low voltage while maintaining a low temperature," as suggested by the Examiner. A person of ordinary skill in the art would not be motivated to modify the combined disclosures of the Boerema and Fernandez references such that the electroluminescent panel is molded to a polymer body. For at least this additional reason, the Examiner has failed to establish *prima facie* obviousness. Therefore, Applicants request that the rejection of independent claim 2 be withdrawn.

Claims 3-9 all depend from independent claim 2 and therefore include all of the features of independent claim 2. Applicants submit that claims 3-9 are also patentable for at least the same reasons discussed above. Furthermore, these claims each recite a unique combination of elements not disclosed or suggested by the combined disclosures of the Boerema and Fernandez references.

Conclusion

Applicants have made a bona fide effort to respond to each and every requirement set forth in the Office Action. In view of the foregoing amendments and remarks, this application is submitted to be in complete condition for allowance and, accordingly, a timely notice of allowance to this effect is earnestly solicited. In the event that any issues remain outstanding, the Examiner is invited to contact the undersigned to expedite issuance of this application.

Applicants do not believe fees are due in connection with filing this communication. If, however, any fees are necessary as a result of this communication, the Commissioner is hereby authorized to charge any under-payment or fees associated with this communication or credit any over-payment to Deposit Account No. 23-3000.

Respectfully submitted,
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